

# ICA Training & Events

## Privacy Policy

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### Policy statement

This Privacy Notice concerns information that relates to a person and / or could be used to identify a person ("*personal data*") that is collected from an event attendee. "Non-personal data" is therefore any information that does not relate to a person and / or cannot be used to identify a person. We take the privacy of your personal data seriously. Please read this privacy policy as it includes important information regarding your personal data and other information.

This policy is in addition to our global privacy policy which can be viewed [here >](#)

### Information we collect

The types of information that we collect across the organisation are:

Name, date of birth, email address, telephone numbers, personal addresses, IP addresses, device information, business name, business address, nature of business, business age, registration number, website, trading volume, nationality, directorship, annual accounts, association memberships. We also use your banking details to make and receive payments.

When registering for our training or trade events, we collect more detailed personal information from you to help us make necessary adjustments to our programme to ensure you have an enjoyable experience tailored to your needs. Please view our Events Privacy Policy to see the full details. We will request your consent to this policy before successfully registering you for any of our events.

### Information that you provide directly

We collect personal information from you:

- through the use of forms, which may be on paper or on our Websites, such as when you login to access our Services, signup to receive our newsletters, register for information;
- when you book an event on our Website and provide us with information about any special requirements, such as dietary requirements, that you may have; and
- if you choose to provide us with information when you use our Website or access our events;
- when you communicate with us for any reason, including by email, postal mail or telephone, and when you use our Services.

Some of the personal information that you provide may include sensitive personal information, such as health-related information or information about your race or ethnicity, biometric data which we need for statutory registration/reporting purposes and to ensure that we can provide the necessary duty of care.

### Information that we collect automatically

When you visit our Website, we may collect certain information automatically from your device.

Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Website, including the pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our Website, where they come from, and what content on our Website is of interest to them. We use this

information for our internal analytics purposes and to improve the quality and relevance of our Website to our visitors.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading 'Cookies', below.

### **Information that we obtain from third party sources**

We may receive personal information about you from third party sources (such as your employer if they enrol you on an event or course, or only where we believe that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us. We collect only the minimum amount of information required from these third parties to enable us to provide the requested service or process any application you send to us (for example, your educational or employment history). We only use the information we receive from these third parties as set out in this Privacy Policy.

### **Use of Your Information**

The information that we collect and store relating to you is primarily used to enable us to provide our Services to you. In addition, we may use the information for the following purposes:

- to provide you with information or Services you request from us;
- We will use our email tools to contact attendees with information relating to past or current events, to inform you of important event information, hotel bookings, pre-arrival information and post event surveys.
- to provide information on other ICA courses and events which we feel may be of interest to you, in accordance with your communications and consent preferences;
- to meet our contractual commitments to you;
- to obtain additional personal information to satisfy statutory legal or association requirements;
- the ICA reserves the right to report any activity which violates any relevant laws or regulations to the appropriate authority. If the ICA is requested by such authority for the Information, the ICA reserves the right to disclose it to them.

In general, we will use any of the information we collect from you only for the purposes described in this Privacy Policy or for purposes that we explain to you at the time we collect such information.

However, we may also use your personal information for other purposes that are not incompatible with the purposes we have disclosed to you (such as statistical purposes) if and where this is permitted by applicable data protection laws.

If you do not want us to use your data for any marketing purposes, you will have the opportunity to withhold your consent to this when you provide your details to us.

Consent can be removed by emailing at [comms@ica-ltd.org](mailto:comms@ica-ltd.org)

### **Storing and retaining your personal data**

The personal information you provided to us is stored within secure servers. We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

All ICA email addresses support TLS email encryption, so it is advised that if you are concerned about the contents of any email to use this encryption.

Where we have given you (or where you have chosen) a password so that you can access certain parts of our sites and portals, you are responsible for keeping these passwords confidential.

Please note that the transmission of information via the internet (including email) is not completely secure and therefore, although we endeavour to protect the personal information you provide to us, we cannot guarantee the security of data sent to us electronically and the transmission of such data is therefore entirely at your own risk. We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business or statutory need to process your personal information, we will either delete or anonymise it.

### **Disclosing your information**

We consider your information to be a vital part of our relationship with you. Therefore, we will not sell your personal data to third parties, including third party advertisers. There are, however, certain circumstances in which we may disclose, transfer or share your personal data with certain third parties without further notice to you, as set forth below.

#### **Parent companies, subsidiaries and affiliates**

We may share your personal data with our parent companies, subsidiaries (*e.g. ICA Bremen*) and / or affiliates for purposes consistent with this privacy policy. Our parent companies, subsidiaries and affiliates will be bound to maintain that personal data in accordance with this privacy policy.

#### **Agents, consultants and service providers**

We may share your personal data with our contractors and service providers who process personal data on behalf of the ICA to perform certain business-related functions. These companies include our venues, hotels, marketing agencies, database service providers, backup and disaster recovery service providers, email service providers and others. In some instances, 3<sup>rd</sup> parties may collect data directly from yourself so to be able to deliver a course or deliver an event on our behalf. In this instance they would be considered the 'data controller'.

A list is available on request but maybe specific to an event. When we engage another company to perform such functions, we may provide them with information, including personal data, in connection with their performance of such functions.

### **Legal requirements**

We may disclose your personal data if required to do so by law in order to (*for example*) respond to a subpoena or request from law enforcement, a court or a government agency (*including in response to public authorities to meet national security or law enforcement requirements*), or in the good faith belief that such action is necessary to (a) comply with a legal obligation, (b) protect or defend our rights, interests or property or that of third parties, (c) prevent or investigate possible wrongdoing in connection with the services, (d) act in urgent circumstances to protect the personal safety of attendees or the public, or (e) protect against legal liability.

Where you are a customer or prospective customer, we may disclose your data to third parties for our marketing purposes so that we can identify products and services we think you will be interested in. Personal data used in this way may include contact details such as name, address, phone number, and email address. When sharing with third party marketing organisations, your data may be processed in countries inside or outside of the EU.

Where data may be processed outside of the EU we will endeavour to ensure the data is processed safely and securely by the 3<sup>rd</sup> party.

### **Keeping your data safe**

All Information will be kept secure and confidential. This means that information can only be exchanged between you, the ICA and any third party to whom the ICA decides to transfer the information to for the purposes detailed above. We follow strict security procedures for storing and disclosing data to prevent unauthorised access.

The ICA uses industry standard practise to safeguard the confidentiality of the information. We treat your information as an asset that must be protected against loss and unauthorised access. ICA employees and relevant contractors use many different security techniques to protect the information from unauthorised access by users inside and outside the ICA. These include password protection, encryption, firewalls and backup files.

You can view the global privacy policy of Aventri (Event registration management system) [here >](#)

### **Third party links**

You might find links to third party websites on our Websites or within documentation we provide.

If you access other websites using the links provided, the operators of these sites may collect information from you which will be used by them in accordance with their own privacy policies which you should review.

We do not accept any responsibility or liability for their policies whatsoever as we have no control over them.

### **Delegate lists**

We may use your personal data to populate a delegate list for each event which may be made accessible to all other attendees. If you do not wish for this to happen then please let us know at the earliest possible opportunity.

### **Social networking**

The Website may offer you the opportunity to share or follow information about us (or the Website or our Services) using third party social networking functionality (such as through "share this", "like" or "follow" buttons).

We offer this functionality in order to generate interest in us, the Website and our Services among the members of your social networks, and to permit you to share and follow opinions, news and recommendations about us with your friends. However, you should be aware that sharing personal or non-personal information with a social network may result in that information being collected by the social network provider or result in that information being made publicly-available, including through Internet search engines.

Please note that we do not exercise, endorse or control the policies or practices of any third-party social network whose functionality you may access through the Website.

You should always read the Privacy Notice of any social network through which you share information carefully in order to understand their specific privacy and information usage practices.

### **International data transfers**

For some of our Services, your personal information may be transferred to, and processed in, countries outside of the EEA. However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Policy. These measures include transferring your personal data to third parties who are located in a country which the European Commission has determined has data protection laws that are at least as protective as those in Europe and transferring your personal data to third parties who have entered into standard contractual clauses with us. For more information about these safeguards please contact us using the contact details provided below.

### **Cookies**

We use cookies and similar tracking technology (collectively, "Cookies") to collect and use personal information about you. For further information about the types of Cookies we use, why we use them and how you can control Cookies please see our Cookie Notice [here >](#)

### **Legal basis**

Our legal basis for collecting and using personal information will depend on the personal information being collected and the specific context in which we collect it.

However, we will normally collect personal information from you only:

- where we need the personal information to perform a contract with you (for example, to enrol you into a course or event);
- where the processing is in our legitimate interests and is not overridden by your rights; or
- where we have your consent to do so;

In some cases, we may also have a legal obligation to collect personal information from you.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

If we collect and use your personal information in reliance on our legitimate interests (or those of any third party), this interest will normally be to operate our website and communicating with you as necessary to provide our services to you and for our legitimate commercial interest, for instance, when responding to your queries, improving our website, undertaking marketing. We may have other legitimate interests and if appropriate we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided below.

## Data protection rights

You have the following data protection rights:

- If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by contacting us using the contact details provided below.
- In addition, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us using the contact details provided below.
- You have the right to opt-out of marketing and telemarketing communications we send you at any time. You can exercise this right by clicking on the "Manage your Marketing Preferences" link in the marketing e-mails we send you and within our Websites.
- Similarly, if we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.
- We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

## Contacting us

The data controller of your personal information will be the ICA unless your data has been captured directly by a third party:

We welcome any queries, comments or requests you may have regarding this Privacy Policy. Please do not hesitate to contact us via email at: [comms@ica-ltd.org](mailto:comms@ica-ltd.org)

## Changes to the privacy notice

You should check this page from time to time to ensure that you are happy with any changes.

If material changes are made to this Privacy Policy, we will notify you by placing a prominent notice on the Website or by contacting you to let you know via the contact details you have provided us with.